

Message

From: Wu, Jennifer [Wu.Jennifer@epa.gov]
Sent: 8/7/2018 8:19:20 PM
To: Kenknight, Jeff [Kenknight.Jeff@epa.gov]; Moon, Wally [Moon.Wally@epa.gov]; Spaulding, Kate [Spaulding.Kate@epa.gov]
CC: Franklin, Richard [Franklin.Richard@epa.gov]; Cool, Richard [Cool.Richard@epa.gov]
Subject: FYI: WA hydroelectric facilities NPDES permits

Hi Jeff, Wally, and Kate (cc: Richard and Rick),

I'm working on several individual NPDES permits for Washington hydroelectric facilities and talked with Richard and Rick earlier. Rick suggested I let you know about the timeline and plans for issuing these NPDES permits.

Briefly, I'm working on issuing permits for the lower Columbia River dams (Bonneville, The Dalles, John Day, and McNary), the lower Snake River dams (Ice Harbor, Lower Monumental, Little Goose, Lower Granite), and the Grand Coulee Dam. These will focus on oil and grease and on cooling water being released in outfalls. They don't cover spills or anything related to temperatures in reservoirs behind the dams.

As you may know, the Administration set an initiative for EPA to issue NPDES permits for all new permit applications by the end of the year. These 9 permits are part of this initiative. My timeline is to go out for public comment the third week of September, issue the permit by the end of November, and have the permit be effective by end of December 2018. I'll be largely basing these permits on the Idaho GP for hydroelectric facilities that went out for public comment at the end of April: <https://www.epa.gov/npdes-permits/draft-npdes-general-permit-hydroelectric-generating-facilities-idaho>. Re: oil and grease, there will be permit limits [Ex. 5 Deliberative Process (DP)] The bulk of controls for oil are in the BMP plan which call for minimizing oil and grease releases, tracking oil use including with oil gauges, ensuring protective seals on all equipment, using "environmentally acceptable lubricants," inspections and maintenance programs, inventorying, and spill prevention measures and controls. (See Sections IV.B and Appendix B of draft Idaho permit).

I wanted to keep you all in the loop on what's going on. If you're interested in reviewing the permit before public comment or have ideas on permit conditions that would reinforce the work in your programs, please feel free to let me know. At the very least, I'll keep you informed about any major changes in the permit re: oil and grease and when we go out for public comment. Rick and Richard, I may reach out to both of you again with questions on permit conditions related to oil and grease. We're also coordinating with the Corps, Services, tribes, and states.

If you have any questions, please don't hesitate to call or email. – Jenny Wu, 3-6328

From: Cool, Richard
Sent: Tuesday, August 07, 2018 11:39 AM
To: Wu, Jennifer <Wu.Jennifer@epa.gov>
Cc: Franklin, Richard <Franklin.Richard@epa.gov>
Subject: Corps Oil Accountability Program

Hi Jenny:

Here is a copy of the oil accountability program that we obtained in doing a 2017 SPCC inspection of the Lower Monumental Dam. Don Redman is one of the key staff that developed this program and we suspect it is under revision and updating.

FYI, Richard . . . **Ex. 6 - Personal Privacy** and Jenny will be taking on some 7+ individual general permits for WA dams Jenny will likely send out an email shortly to alert you and Wally et al. to the schedule of permit development and issuance in case you are interested.

Jenny, thanks for the call and the update on what's up.

Rick